

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS*filed 2/24/04
JSP*

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 04-10045 DPW
)	
LOUIS RAMIREZ,)	
A/K/A "KING LITTLE PSYCHO")	
)	
-----)	
UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 04-10046-RGS
)	
ANGEL GONZALEZ,)	
A/K/A "KING A SHOT", ET AL)	
)	
-----)	
UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 04-10052-GAO
)	
JUAN RAMOS,)	
A/K/A "KING FAITH")	
)	
-----)	

GOVERNMENT'S MOTION TO CONSOLIDATE FOR
DETENTION AND/OR OTHER PRETRIAL PROCEEDINGS
AND SUBMISSION OF DETENTION AFFIDAVIT

The United States hereby moves to consolidate the above captioned matters for purposes of detention and/or other pretrial proceedings. In support of this motion, the government states as follows:

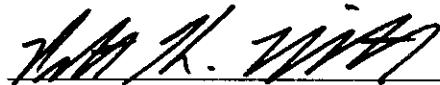
1. On February 19, 2004, a grand jury in this District returned ten separate but related indictments, which included the above-captioned cases. These cases all arose from a broader FBI

investigation of the drug trafficking and other illegal activities of the Almighty Latin King/Queen Nation ("the Latin Kings"), a violent street gang operating in, among other places Lawrence and Lowell, Massachusetts. Because evidence regarding the dangerousness of these defendants includes evidence regarding their involvement in the Latin Kings (and its leadership), consolidation of these cases will enable these matters to be presented to the court in an efficient and orderly way and is therefore in the interest of justice.

In further support of this motion, the government refers this court to the detention affidavit of FBI Special Agent Mark Karangekis, which is attached hereto.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney



By: JOHN A. WORTMANN, JR.
PETER K. LEVITT
Assistant U.S. Attorneys

February 24, 2004

AFFIDAVIT OF SPECIAL AGENT MARK KARANGEKIS

I, Mark Karangekis, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI"). I am submitting this affidavit in support of the government's motion that the following individuals be detained pending trial: CARMELO RODRIGUEZ, A/K/A "KING CARMELO"; RICARDO ROSARIO, A/K/A "KING BND"; GIECLIFF RODRIGUEZ, A/K/A "KING BEAR"; JONATHAN DELEON, A/K/A "KING DANGER," A/K/A "KING JONATHAN"; VICTOR ARROYO, A/K/A "KING VICIOUS"; ANGEL LUIS RIVERA, A/K/A "KING VENOM,"; ONIX FIGUEROA, A/K/A "KING ONIX"; JUAN CONCE, A/K/A "KING SANTOS"; FERNANDO FROMETA, A/K/A "KING FERN"; JUAN RAMOS, A/K/A "KING FAITH"; JORGE ROSARIO, A/K/A "KING INFAMOUS"; EDWIN SERRANO, A/K/A "KING PYSCHO"; LOUIS RAMIREZ, A/K/A "KING LITTLE PSYCHO"; EDWIN RODRIGUEZ, A/K/A "KING CHOLO"; JOSUE RODRIGUEZ, A/K/A "PERRO"; ANGEL GONZALEZ, A/K/A "KING A-SHOT"; JOSE GONZALEZ, A/K/A "KING STRIKE"; and, LUIS RODRIGUEZ, A/K/A "ONE EYED LUIS" (hereinafter collectively referred to as "the Targets"). All of the Targets have been charged with various drug and/or firearms violations in indictments or criminal complaints issued since February 19, 2004. All of these individuals are also alleged to be members (including members of

the local or regional leadership) or associates of the Almighty Latin King/Queen Nation ("the Latin Kings"), a violent street gang operating in, among other places, Lawrence and Lowell, Massachusetts.

2. I have been employed by the FBI for approximately twelve (12) years. During that time, I have been involved in dozens of investigations relating to a wide variety of suspected criminal activity, including, among other things, drug and firearm trafficking by organized street gangs. I have been the affiant on numerous affidavits in support of criminal complaints and other applications and have spent much of the last four years investigating gangs and gang-related activity in and around the city of Lawrence.

II. BACKGROUND OF THE INVESTIGATION

3. For the last eighteen months, I have been the lead agent on a multi-agency investigation targeting the leadership and other significant members of those chapters of the Latin Kings operating in Lawrence and Lowell, Massachusetts. Since this investigation was initiated in 2002, law enforcement agents have successfully made purchases of heroin, cocaine, and cocaine base from leaders, members or associates of the Latin Kings. All of these purchases were made in the Greater Lawrence/Lowell area by cooperating witnesses ("CW's") who wore recording equipment and agreed to have their meetings and conversations with the Targets recorded. Many telephone conversations setting up drug purchases

(in which prices and quantities of drugs were discussed) were also consensually recorded. The cooperating witnesses were also carefully surveilled as they dealt with the Targets.

4. When this investigation was initiated, one of its principal objectives was to develop intelligence about the Latin Kings' chapters in Lawrence and Lowell including, among other things, their size, the identity and location of their leadership, the scope of their illegal activities, and the way in which they are organized and operate. To do this, agents interviewed a large number of confidential informants and cooperating witnesses, reviewed records and recordings at jails, police departments and courts, examined documents regarding telephones, automobiles and real estate used by suspected gang members, and conducted physical surveillance of individuals and locations in Lawrence, Lowell and other surrounding communities.

5. I have not included each and every fact developed in this investigation in this affidavit. Rather, this affidavit includes facts I believe to be relevant to issues under 18 U.S.C. § 3142 with respect to the Targets.

III. THE ORGANIZATION, OPERATIONS, AND LEADERSHIP
OF THE LATIN KINGS

6. In the course of developing intelligence about the Latin Kings, agents participating in this investigation have spoken to dozens of confidential informants and cooperating witnesses regarding the gang and its operations. These individuals include

current or former members of the Latin Kings (including former members of its leadership), who were personally familiar with the gang, its operations, and its leaders. The information about the Latin Kings and its operations provided in paragraphs 9-29, represents a summary of information provided by these individuals, by various cooperating witnesses, and information obtained from other sources. The information provided by individual informants has been corroborated by comparing it to information given by other cooperators, information learned by reviewing consensually recorded telephone calls from area correctional facilities where Latin King members are incarcerated, and from other sources, including consensually recorded conversations made during drug purchases that took place over the course of the investigation.

7. Information provided by current or former members of the Latin Kings has also been corroborated by subsequent developments in the investigation. For example, informants identified the Targets as Latin King members involved in drug trafficking in the Lawrence/Lowell area. In fact, cooperating witnesses made controlled purchases of drugs from the Targets, many of whom discussed other gang members and gang activities during those purchases. Sources also identified GIECLIFF RODRIGUEZ, A/K/A "KING BEAR" as having been recently elevated to the Latin King's regional leadership. In fact, RODRIGUEZ bragged to a cooperating witness on tape during a sale of drugs that he was now the

"number three" man in the state for the gang. Information provided about the Latin Kings described herein has also been confirmed by checking police records, by speaking with individuals who participated in the events, and by examining primary gang documents, including the materials attached as Exhibits 1 and 2. Other items of corroboration are described below. I consider the information set forth in this affidavit including the information regarding the operation of the Latin Kings to be reliable because, among other things, it has been provided by multiple sources or otherwise corroborated.

8. What the investigation over the eighteen months has revealed is that the Massachusetts Chapter of the Latin Kings is a street gang with hundreds of members in Lawrence, Lowell and other cities. The Latin Kings operate local chapters throughout the state including chapters inside many correctional facilities. Many members of the gang are involved in a broad range of illegal activities including drug trafficking and crimes of violence undertaken in furtherance of protecting the interests of the gang and its members. The involvement by the Targets in the Latin Kings heightens the likelihood that they would commit further crimes (including violence directed at parties who have cooperated with the government) if they were released. This shows that there is no condition or combination of conditions under which they can be safely released to the community.

A. The Origins of the Almighty Latin King/Queen Nation

9. The Latin Kings was formed in the 1960s in Chicago. It's stated organizational purpose was the organization of Hispanics dedicated to overcoming an "oppressive government" and uplifting all "third world" people.

10. The Latin Kings developed a "Manifesto" of laws, rules, and regulations governing the behavior of its members which has evolved into a detailed code or organizational and behavioral principles. Attached to this affidavit as Exhibits 1 and 2 are copies of the Manifesto and the gang's Massachusetts Policy Book seized from a Lawrence, Massachusetts apartment in 2001.

11. In its early years, the Latin Kings formed small coalitions to protect the interests of its members. As time passed, however, coalitions known as "strike back groups," developed into traditional street gangs who wanted to protect their "turf" from outsiders and rivals.

12. The desire to protect "turf" and a strict "code of silence" as outlined in the "Manifesto" has created a culture of secrecy and institutional violence within the Latin Kings. Latin King members are expected to come to the aid of their fellow members on request. Hence, whenever the economic or other interests of the gang (such as its primacy in certain designated geographic areas or the drug trafficking activities of its members) are threatened, members are required to join in on organized actions aimed at mutual protection. These actions

frequently take the form of "missions" i.e., acts of violence directed at rivals.

B. General Leadership Structure of the Latin Kings

13. The Latin Kings have a highly organized rank structure on the National, Regional, and local levels. The leadership at each level is comprised of a Supreme Crown Inca and an Executive Crown of officers consisting of a Carsique, (or second-in-command), a Minister of Defense (responsible for meting out punishment, waging war against rivals, and maintaining the gang's arsenal), a Treasurer (responsible for the collection of dues, tribute and fines and the maintenance of a common pool of money known as a "fundle" used to support concerted activities such as bailing members out of jail and purchasing weapons) and a Secretary (responsible for maintaining records and the administration of the gang's business).

14. Although the Latin Kings originated in the Midwest, they now have Regional and Local Chapters throughout the Eastern United States. Regional Chapters must be sanctioned by the national leadership in Chicago. Each Regional Chapter must then sanction its local chapters. While each Regional Chapter adheres to the laws and regulations set out in the Manifesto, the Regional Chapters typically have their own regional policy book to guide the leadership and regulate the behavior of its membership. A copy of the policy book for Massachusetts also seized in Lawrence in 2001 is attached as Exhibit 1. It includes

such things as a Membership Application, Voting Form, a "Convict's Code of Conduct," a Guide to starting a local chapter of the Latin Kings in Massachusetts, and a form for funeral arrangements for Latin King members.

15. The Regional and Local Chapters adhere to the same leadership structure in place at the national level. The Supreme Crown Inca for the region is typically the most senior member of the gang who chooses his Executive Crown Council. The Executive Crown Council for a region has a great deal of influence in the selection of the Local Crown Incas for local chapters within the Region.

16. A prime example of the rigid organizational structure of the Latin Kings is its comprehensive "judicial system." The Latin Kings maintain their own "system of justice" pursuant to which members are formally "charged" with violations of the "Manifesto" or other gang rules, those charges are adjudicated, and individuals found guilty of violating gang rules are punished. Latin Kings who violate gang rules may face fines, physical punishment, or expulsion from the gang. Members who cooperate with law enforcement may face particularly harsh punishment up to and including execution. Forms for disciplinary proceedings are also included in the Massachusetts Policy Book attached as Exhibit 1.

17. The investigation in this case has demonstrated the Latin Kings' judicial system (and its efforts to control and

benefit from the drug trafficking of its members) in action. One of the cooperating witnesses working for the FBI was actually brought up on charges during the investigation for failing to pay tribute (in the form of a percentage of drug revenues) to the gang in connection with drugs being secretly purchased for the FBI. The individual was fined \$500 for his/her transgressions and given the receipt attached as Exhibit 3.

18. Gang finances flow from the membership. Individual members are expected to pay regular dues, tribute (usually in the form of a percentage of revenues derived from illegal activities), and fines levied as a result of violations of gang rules. In turn, these monies are either passed to the regional leadership for their use or maintained in a common fund known as the "fundie" that is used for bail, weapons purchases and other joint gang activities.

C. Illegal activities of the Latin Kings

19. Much of the revenue used to operate the Latin Kings thus flows from illegal activities of its members. Although the distribution of marijuana is the only drug trafficking formally accepted by the gang, in fact gang members sell a wide range of illegal drugs and, as the CW in this case learned, are expected to remit a portion of their drug proceeds to the local leadership. The atmosphere of interdependence and secrecy that surrounds the Latin Kings often leads members to sell illegal drugs together. The closed nature of the drug trafficking by

Latin King members was demonstrated in the current investigation by Lawrence Local Crown leader VICTOR ARROYO, A/K/A "KING VICIOUS," when he commented on the federal law enforcement presence in Lawrence but told a cooperating witness (who ARROYO believed to be his drug customer and fellow Latin King member) on tape that "the feds" wouldn't get him because he only dealt with people he knows and trusts.

20. The atmosphere of interdependence that pervades the Latin Kings also results in the use of institutional violence often imposed to protect the illegal activities of gang members. Unwanted competition from other drug traffickers, turf threats from rival gangs, or any conduct that is perceived to be disrespectful to the Latin Kings or its members can produce a call to the membership and result in what is known as "Missions," i.e., organized violence or shootings. In this case, for example, a cooperating witness was contacted by VICTOR ARROYO, A/K/A "KING VICIOUS" and directed to participate in a "Mission" against Dominican drug traffickers who had assaulted a member of the gang in Lawrence and were threatening the geographic primacy of that individual's drug trafficking. Local police went to the meeting location and found a large group of known Latin King Members congregating. Because of the information provided by the CW, they were dispersed.

D. The Latin Kings in Massachusetts

21. A Regional Chapter of the Latin Kings for Massachusetts was first sanctioned by the national leadership around 1990. The first Supreme Inca for Massachusetts was ALEX DELGADO, A/K/A "KING GRIMM," who is credited with creating the Massachusetts Policy Book attached as Exhibit 2. After DELGADO received a life sentence for murder and was removed from power, ANTHONY COLLAZO, A/K/A "CHINO CAYASO," succeeded him. Although COLLAZO was also subsequently incarcerated, he managed to maintain his position as the Region's Supreme Inca due in part to work performed by his Carisque, MICHAEL CECCHETELLI, A/K/A "KING MERLIN." CECCHETELLI is regarded as the member of the Latin Kings responsible for its Pennsylvania chapter and is viewed as an expert in recruitment and organization.

22. The Latin Kings operate several numerous local chapters in Massachusetts. They presently include chapters in Springfield (generally viewed as the strongest and most influential group), Worcester, Lawrence, Lowell, New Bedford, and Brockton, among others. The Local Crowns for each of these chapters report directly to a Regional Crown officer assigned to oversee that chapter. Typically, that Regional Crown officer is a former member of the local chapter.

23. The Latin Kings also have a significant presence in Massachusetts prisons. Leadership inside jail is usually determined by seniority. Latin Kings chapters in prison are often actively involved in recruitment of new members. Many

Latin Kings were originally "blessed" into the gang while incarcerated.

E. Recent Changes in the Massachusetts Latin Kings

24. During the past two years, the Massachusetts chapter of the Latin Kings has undergone significant changes started by the incarceration of ANTHONY COLLAZO in 2001. At the time of COLLAZO's incarceration, his Carsique, MICHAEL CECCHETELLI, A/K/A "KING MERLIN," was also incarcerated. As a result, the National leadership sent a representative from New Jersey, HERMAN GONZALEZ, A/K/A "KING INDIO," to oversee the operations of the Regional Chapter here.

25. After being placed in command in Massachusetts, KING INDIO selected representatives from Lawrence to be regional officers for the eastern portion of Massachusetts. Those selected included JUAN RAMOS, A/K/A "KING FAITH," ANGEL LUIS RIVERA, A/K/A "KING VENOM," and OLGA VEGA HERNANDEZ, A/K/A "QUEEN STAR." The elevation of these individuals resulted in new officers being appointed for the Local Lawrence chapter including JUAN CONCE, A/K/A "KING SANTOS"; VICTOR ARROYO, A/K/A "KING VICIOUS," EUGENIO RODRIGUEZ, A/K/A "KING CORA"; and JORGE ROSARIO, A/K/A "KING INFAMOUS." As a result of these changes, the local Lawrence chapter enjoyed a greater degree of influence in the state and some of the new leaders used that power to increase the distribution of drugs and to commit violence against

other Latin Kings.

26. Ultimately, KING CHINO CAYASO and KING MERLIN became aware that KING INDIO was allowing activities by Regional Crown Officers and other Latin King members that violated prohibitions against committing violence against Latin Kings, selling drugs other than marijuana, failing to make tribute payments to the local crowns and maintain discipline in local chapters and maintain the "peace" with rival gangs.

27. After his release from jail, KING MERLIN was given the job of attempting to re-establish order in the Massachusetts Region. One of KING MERLIN's first acts was to send KING INDIO back to New Jersey to face "charges" in Latin King tribunals.

28. KING MERLIN also undertook to reorganize the gang's leadership across the state. KING MERLIN chose regional officers from the local Lowell, Boston, Worcester, and New Bedford chapters and set up a new slate of leaders for the eastern regional chapter. It now included the following members: ANTHONY COLLAZO, A/K/A "KING CHINO CAYASO" (Supreme Inca), MICHAEL CECCHETELLI, A/K/A "KING MERLIN" (Carsique): GIECLIFF RODRIGUEZ, A/K/A "KING BEAR" (Minister of Defense), FRANK PERNA, A/K/A "KING JUSTICE" (Treasurer); and, AMANDA ZAMPELL, A/K/A "QUEEN CHICHI" (Secretary).

29. As a result of KING BEAR's elevation to the Regional Crown Council, the Local Lowell Chapter became more significant than its Lawrence counterpart and KING MERLIN began to regard the

Lowell and Lawrence Chapters as a single entity. Lowell Chapter members such as ANGEL GONZALEZ, A/K/A "KING A-SHOT" were dispatched by KING MERLIN to oversee the Lawrence chapter and persuade JUAN CONCE, A/K/A "KING SANTOS" to re-organize the Lawrence chapter's leadership. MERLIN also replaced the leadership of the Lowell chapter putting CARMELO RODRIGUEZ, A/K/A "KING CARMELO," JONATHON DELEON, A/K/A "KING DANGER," RICARDO ROSARIO, A/K/A "KING BND" and MELISSA LOPEZ, A/K/A "QUEEN MELLO" into positions of leadership. KING MERLIN's ultimate goal is apparently to reorganize the weaker chapters of the Latin Kings in Massachusetts and to unify gang members throughout the state.

IV. THE TARGETS

30. Based on the intelligence developed in the first phase of this investigation, agents began directing cooperating witnesses to make controlled purchase of narcotics from members and associates of the Latin Kings. Individuals were targeted based on their drug trafficking, their position in the Latin Kings, and their demonstrated capacity for violence and /or other crimes.

31. The following is a list of the Targets together with a brief synopsis of their role in the investigation and information regarding their gang association and capacity for violence. Information set forth below comes from sources I consider to be reliable including, among other things, what the Targets did and

said over the course of the investigation.

A. GIECLIFF RODRIGUEZ, A/K/A "KING BEAR"

32. GIECLIFF RODRIGUEZ is presently the Latin King's Minister of Defense for the entire state.¹ KING BEAR acknowledged his position of leadership in a recorded conversation with a cooperating witness when he stated he was the number three warrior in the state for the Latin Kings.

33. RODRIGUEZ made three sales of cocaine to a cooperating witness during the investigation. During one of these sales (on November 1, 2003), RODRIGUEZ pulled a nine millimeter handgun out of his waistband, placed it under the seat beneath him and discussed a gang shooting that he had been involved in with CARMELO RODRIGUEZ, A/K/A "KING CARMELO." During another sale three days later, RODRIGUEZ told the CW he was armed and stated that he had shot another Latin King member in the knee. RODRIGUEZ also negotiated to sell the cooperating witness guns and indicated that he was in regular contact with KING MERLIN who, as is set forth above is the Carisque for the state.

B. CARMELO RODRIGUEZ, A/K/A "KING CARMELO"

34. CARMELO RODRIGUEZ was identified as the Supreme Inca for the Lowell Chapter of the Latin Kings. RODRIGUEZ made eight

¹ In correspondence recently intercepted in the Massachusetts prison system, there is some evidence that KING BEAR has been removed from his regional office due to his own activities. That has not yet been confirmed.

sales of cocaine to a cooperating witness (either by himself or with his co-defendants). RODRIGUEZ also stated on tape that he had "flushed" \$6,000 worth of cocaine when the Lowell police came to his house looking for JONATHAN DELEON (after DELEON had shot someone on New Year's Eve) and said (also on tape) on two other occasions that he was regularly selling cocaine.

35. CARMELO RODRIGUEZ was identified as the owner of at least one of the guns seized by the Lowell Police Department from an abandoned car in December, 2003. Law enforcement reports also indicate that CARMELO RODRIGUEZ was arrested in 2001 after the State Police intercepted him and other suspected Latin King members en route to a suspected gang hit. Three guns were recovered on that occasion.

C. RICARDO ROSARIO, A/K/A "KING BND"

36. ROSARIO made two sales of cocaine to a cooperating witness and assisted the cooperating witness obtain cocaine on a third occasion. ROSARIO also advised the CW that he was getting ounces of cocaine from KING CARMELO for \$850 and was selling 4-5 ounces a week. ROSARIO also stated in a consensually recorded telephone call that he had ".45's" for sale "right out of the box."

D. JONATHAN DELEON, A/K/A "KING DANGER," A/K/A "KING JONATHAN"

37. JONATHAN DELEON has been identified as the Latin King's Minister of Defense appointed by KING MERLIN for the Lowell

chapter. MERLIN also allegedly gave DELEON the responsibility of preparing "charging papers" for Kings who violated gang rules while KING INDIO was running the state. DELEON made one sale of cocaine to a CW in which he stated that "the Nation" (the Latin Kings) was doing well in jail but was having problems on the street. GIECLIFF RODRIGUEZ also identified DELEON as the person who shot an individual named "JONGI" at a club in Lowell on New Year's Eve.

E. VICTOR ARROYO, a/k/a "KING VICIOUS"

38. VICTOR ARROYO was identified as a Latin King leader and an active drug trafficker. ARROYO has been reported to be the third Local Crown of the Kings in Lawrence and "Minister of Defense" for the local chapter. In that capacity he is reported to be responsible for organizing and maintaining "hit squads" of Latin King members assigned to go out on gang missions. As set forth above, that was corroborated when ARROYO demanded that a cooperating witness go out on such a mission during the course of the investigation.

39. ARROYO made a total of 14 sales of crack cocaine and heroin to cooperating witnesses (and on one occasion, to an undercover officer) during the investigation. Some of the buys were made to a Latin Kings member with whom ARROYO regularly discussed gang business. In many of the conversations (including the conversation with an undercover agent), ARROYO also discussed

guns and gun purchases. In others, ARROYO acknowledged selling as much as 60 grams of heroin in a single week.

F. ANGEL RIVERA, A/K/A "KING VENOM"

40. ANGEL RIVERA is another member of the Latin Kings leadership. He has been identified as the Secretary of the Eastern Region and one of two individuals who holds the gang's fundle.

41. Together with VICTOR ARROYO, RIVERA participated in nine sales of heroin made to a cooperating witness. Conversations during those buys confirmed RIVERA's gang connection in that they include discussions of guns, drugs, and gang affairs as well as RIVERA's sale of a bulletproof vest to a drug connection.

G. ONIX FIGUEROA, A/K/A "KING ONIX"

42. ONIX FIGUEROA is also a blessed member of the Latin Kings. He supplied the crack cocaine that ARROYO sold to a cooperating witness on February 4, 2003.

43. FIGUEROA was also present when one of the cooperating witnesses working for the FBI was violated for selling drugs without paying 15% of the proceeds to the gang. When the CW was summoned to 1016 Middlesex Avenue in Lowell by GIECLIFF RODRIGUEZ and others to pay that fine, FIGUEROA was in an adjoining room being beaten for his own alleged violations of gang policies.

H. JUAN CONCE, A/K/A "KING SANTOS"